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**By ECF**

Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**Re: *United States v. Ahuja, et al.*,  
18 Cr. 328 (KPF)**

Dear Judge Failla:

We write to respectfully request the Court's permission to submit what could be characterized as a "reply" to the Government's letter of this morning. The Government's letter responds to defendant Anilesh Ahuja's letter motion seeking to compel the Government to provide information and/or documents in connection with its Jencks Act disclosures. As counsel for Mr. Shor, we have not yet weighed in on these issues and would like to submit a short letter (no more than two pages) on the specific issue of the Government's refusal to produce grand jury testimony from non-percipient witnesses who summarized statements that fact witnesses made to the Government. For reasons that we would like to describe, we believe such testimony should be produced and can put in a short letter by the end of the day tomorrow, if not earlier.

Thank you in advance for your consideration of this matter.

Respectfully submitted,



Daniel S. Ruzumna

cc: Counsel of Record